



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

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MAR 10 1989

In Reply Refer to: 3HW33

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Vince Dunne
Van Waters and Company - Hummelstown
P.O. Box 277
Hummelstown, Pennsylvania 17036

Re: PAD014231005

Dear Mr. Dunne:

Sections 3004(u) and 3008(h) of the Hazardous and Solid Waste Amendments of 1984 (RCRA Reauthorization) give EPA the authority to require corrective action for all releases of hazardous wastes or constituents from any solid waste management unit ("SWMU") as defined on the enclosed sheet. This requirement applies to operating units, inactive units, and those that have been closed.

EPA must first determine the location of all SWMUs at a facility. Next, we must determine whether or not any "releases" (see definitions) originated at these units. Our records indicate that you either did not receive or did not respond to a previous request by EPA to submit the information described below. In order to enable us to make these determinations, you must provide the following information.

1. A topographic map showing the facility and a distance of 1,000 feet around it, at a scale of one-inch equal to not more than 200 feet. In addition to showing the location of any hazardous waste management facilities for which you are seeking a permit, it must locate all existing and former SWMUs at your facility.

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2. For each SWMU, provide a description of the unit's functions, material of construction, dimensions, capacity, ancillary systems (piping), etc. If available, provide engineering drawings of the units and their foundations. For closed facilities, also provide a copy of the closure plans, a description of how closure was performed, and any relevant post-closure information you have available.
3. For each SWMU, provide a description of all solid wastes including hazardous wastes and hazardous waste constituents received by the units. Also, provide information on quantities of hazardous wastes and hazardous waste constituents received by each SWMU and the dates during which these units operated.
4. For each solid waste, SWMU, describe any releases (or possible releases) originating at the unit. This should include information on the date of release, type of solid waste, hazardous waste or hazardous waste constituents released, quantity released, nature of the release, extent of migration, and cause of release, for example, an overflow, broken pipe, tank leak, etc. Also, provide any available data which would quantify the nature and extent of environmental contamination including the results of soil, surface water and/or groundwater sampling and analysis efforts. Likewise, any monitoring information that indicates releases are not present should also be submitted.

Please be advised that Section 3004(u) applies to those treatment/storage/disposal facilities required to obtain RCRA permits. If you are not required to obtain a RCRA permit, please indicate that fact in your response.

Additionally, Section 3008(h) applies to all facilities that operated under interim status. In some cases, this provision will not apply to a facility because it never actually operated under interim status; for example, a storage facility that filed for interim status, but never stored for more than 90 days. If you determine that this provision does not apply to your facility, you must list specific reasons that support the fact that you never operated under interim status.

If some or all of the above-requested information has been previously submitted to this office, please reference this information in your reply.

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We request under Section 3007 of the Act, 42 U.S.C. Section 6927, that you submit two copies of the above requested information within fourteen (14) days of your receipt of this letter to both EPA and the Pennsylvania Department of Environmental Resources (PA DER).

All information you submit should be certified as required by regulation 40 CFR 270.11(d). Should you have any questions concerning this letter, please contact William L. Walsh at (215) 597-1192.

Sincerely,


Robert L. Allen, Chief

Waste Management Branch

Enclosure

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Definitions

Release -

... any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, but excluding releases otherwise permitted or authorized under law.

Solid Waste Management Unit -

... any landfill, surface impoundment, waste pile, land treatment unit, incinerator, tank (including storage, treatment, and accumulation tanks), container storage units, injection wells, wastewater treatment units, elementary neutralization units, transfer station, and recycling units that received solid or hazardous waste at any time.